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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03698-SI

**STIPULATED REQUEST BY
DEFENDANTS FOR EXTENSION OF
TIME TO ANSWER PLAINTIFFS'
SECOND AMENDED COMPLAINT**

1 Pursuant to Civil Local Rules 6-2 and 7-12, the parties hereby stipulate and respectfully
2 request that the Court extend the time for Defendants to answer Plaintiff's Second Amended
3 Complaint to December 15, 2025. In support of this stipulation, the parties state as follows:

4 (1) Plaintiffs filed their original complaint on April 28, 2025. ECF 1. Plaintiffs
5 amended their complaint on May 14, 2025. ECF 100. The parties stipulated to a
6 three-week extension of the deadline for Defendants to respond to Plaintiffs'
7 amended complaint to July 21, 2025. ECF 175. On July 21, 2025, Defendants filed
8 a motion to dismiss Plaintiffs' amended complaint. ECF 216. The parties then
9 stipulated to a two-week extension of Plaintiffs' deadline to respond to Defendants'
10 motion to dismiss, until August 18, 2025. ECF 233. Briefing on the motion to
11 dismiss was completed on August 25, 2025. ECF 252. On September 9, 2025, the
12 District Court "denie[d] the motion with the exception that the claims against
13 DOGE are dismissed with leave for plaintiffs to amend to clarify the DOGE
14 allegations" by September 30, 2025. ECF 259 at 1, 13. On September 23, 2025,
15 prior to Plaintiffs filing their Second Amended Complaint, the parties stipulated to
16 a 30-day extension of the deadline by which Defendants would file their Answer to
17 the operative complaint. ECF 265. On September 29, 2025, Plaintiffs filed their
18 Second Amended Complaint. ECF 270. The parties now respectfully request that
19 the Court extend the time for Defendants to respond to Plaintiffs' Second Amended
20 Complaint to December 15, 2025.

21 (2) Defendants' resources are severely constrained due to the ongoing lapse in
22 appropriations. Accordingly, the proposed extension of time would allow
23 Defendants to focus their resources on the resolution of pending discovery disputes
24 and other issues.

25 (3) The proposed extension of time would not affect other case deadlines.

26 In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under
27 penalty of perjury that all signatories have concurred in the filing of this document. Further,
28 pursuant to Civil Local Rule 6-2(a), undersigned counsel for Defendants has submitted a

1 declaration in support of this stipulation.

2 A proposed order is attached.

1 Dated: October 24, 2025

Respectfully submitted,

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DECLARATION

I declare, under penalty of perjury, that the factual assertions contained in this stipulation are true and correct to the best of my knowledge.

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